

## **Equality Impact Assessment Template**

To complete the template, please refer to the Equality Impact Assessment Process & Guidance Notes. Section 5 (5.1 to 5.8) in pages 11 to 17 provides a step-by-step guide on how to carry out initial, partial and full impact assessments.

- (1) The General Information section must be completed in all assessments.
- (2) For an Initial Impact Assessment, complete Sections 1 - 4
- (3) For a Partial Impact Assessment, proceed to complete Section 5
- (4) For a Full Impact Assessment, proceed to complete Sections 6- 8

<b>General Information</b>	
Name of function/policy: Starter Tenancies Procedure	
Subsidiary/Directorate: PCHA	
Officer completing the assessment	
Name:	Job title: Policy Officer
Tel. no:	Email address:
Date of assessment: 09/10/08	
Is this an existing or proposed function/policy? Proposed	
<b>Initial Impact Assessment (Sections 1- 4)</b>	
<b>Section 1. Responsibility and Ownership</b> (refer to 5.1 in pages 11 & 12 in guidance notes)	
1.1 Who is responsible for this function/policy at senior management level? (this could be a named individual or a group e.g. DEG) Deputy Director Housing Head of Supported Housing	
1.2 Who is responsible for this function/policy on a day-to-day basis? (this could be a named individual or a group) Housing Services Manager Lettings and Allocations Manager Neighbourhood Liaison Manager Tenant Support Team Manager	
1.3 Who else, both internally and externally, influences delivery of this function/policy? Housing Services Team Income Services Team Lettings and Allocations Team Neighbourhood Liaison Team Tenant Support Team	

Local Authorities  
 Local support agencies, e.g. mediation services  
 Police  
 Residents

**Section 2. Aims and Objectives of the Function or Policy**  
 (refer to 5.2 in page 12 in guidance notes)

- 2.1 What are the aims and objectives of this function/policy?
- To prevent anti-social behaviour by taking proactive and preventative action
  - To intervene early where breaches of tenancy have been committed
  - To put in place robust support mechanisms for new households in order to enable them to sustain their tenancies
  - To encourage the development of sustainable communities in which people want to live
  - To operate an open and transparent system of property allocation
  - To carry out intensive housing management of new tenancies

2.2 Who are the target groups that will benefit from this function/policy?  
 All new residents on schemes where starter tenancies are in operation.

- 2.3 What are the intended outcomes of this function/policy?
- Lower levels of anti-social behaviour among starter tenants than comparable new tenants with Assured Tenancies
  - Quicker resolution to anti-social behaviour cases
  - Increased resident satisfaction
  - Lower levels of rent arrears among starter tenants due to more intensive management of the tenancy
  - To sustain tenancies and seek eviction as a last resort

**Section 3. Relevance to the General Duty:**  
 ○ **Eliminating Unlawful Discrimination,**  
 ○ **Promoting Equality of Opportunity, and**  
 ○ **Promoting Good Community Relations**  
 (refer to 5.3 in pages 12 - 15 in guidance notes)

- The following questions may help to guide relevance to the General Duty :
- Is the policy/function directly or indirectly discriminatory? Refer to Guidance Notes Section 5.3.1 in page 13 for definition of discrimination.
  - Is the policy/function intended to increase equality of opportunity by implementing positive action to redress disadvantages? Is this lawful?
  - Is the policy/function likely to result in different outcomes for different groups? How the impacts affect relation between groups or between Genesis and different community groups?

3.1 Is there any evidence that this function/policy may have/has had positive, adverse or neutral impact upon the General Duty on the following groups of people:

examples of evidence - monitoring/performance data, surveys, evaluation reports, census, consultation findings, inspection reports, partner organisations data etc.

examples of adverse impact – lower success rates in allocating/selecting process, eligibility criteria which disadvantage any groups, access denied/difficult compared to other groups, poorer quality of service/information etc

	Positive	Adverse	Neutral
	Yes/No	Yes/No	Yes/No

3.1.1 Ethnic Groups	<b>Yes</b>	<b>No</b>	<b>No</b>
<p>List the evidence: As this is a new procedure, PCHA does not have any evidence of the impact its operation may have. In line with the rest of its operations, the association has translation and interpreting services that can be used where particular communication needs have been identified. PCHA will provide all starter tenants with information about their new tenancy, and will carry out regular visits to support people to sustain their tenancies.</p> <p>Starter tenants have a less security of tenure than other residents and so may be more vulnerable to eviction. PCHA will collect monitoring information on the number of starter tenants evicted/extended/converted, action taken, appeals, and the number of households accessing support services; this will be analysed by diversity. This monitoring should enable any potential discriminatory action to be picked up during the pilot. Starter tenants will also have the right to appeal against eviction/extension to a panel of senior managers.</p>			
3.1.2 Gender (including transgender)	<b>Yes</b>	<b>No</b>	<b>No</b>
<p>List the evidence: As this is a new procedure, PCHA does not have any evidence of the impact of operating the starter tenancies procedure. Starter tenants have a less security of tenure than other residents and so may be more vulnerable to eviction. PCHA will collect monitoring information on the number of starter tenants evicted/extended/converted, action taken, appeals, and the number of households accessing support services; this will be analysed by diversity. This monitoring should enable any potential discriminatory action to be picked up during the pilot. Starter tenants will also have the right to appeal against eviction/extension to a panel of senior managers.</p> <p>PCHA will provide all starter tenants with information about their new tenancy, and will carry out regular visits to support people to sustain their tenancies.</p>			
3.1.3 Disability	<b>Yes</b>	<b>No</b>	<b>No</b>
<p>List the evidence: As this is a new procedure, PCHA does not have any evidence of the impact of operating the starter tenancies procedure. Starter</p>			

<p>tenants have a less security of tenure than other residents and so may be more vulnerable to eviction. PCHA will collect monitoring information on the number of starter tenants evicted/extended/converted, action taken, appeals, and the number of households accessing support services; this will be analysed by diversity. This monitoring should enable any potential discriminatory action to be picked up during the pilot. Starter tenants will also have the right to appeal against eviction/extension to a panel of senior managers.</p> <p>PCHA will provide all starter tenants with information about their new tenancy, and will carry out regular visits to support people to sustain their tenancies. Information about the starter tenancy programme will be provided in plain English at the sign-up and officers will also explain PCHA's procedures verbally.</p> <p>All new residents nominated to starter tenancies will receive a vulnerability assessment. This should pick up whether the resident or a member of their household has any support needs or vulnerabilities. PCHA aim to put in place the necessary support networks and refer new residents to the appropriate services.</p>			
<p><b>3.1.4 Age</b></p>	<p><b>Yes</b></p>	<p><b>No</b></p>	<p><b>No</b></p>
<p>List the evidence: As this is a new procedure, PCHA does not have any evidence of the impact of operating the starter tenancies procedure. Starter tenants have a less security of tenure than other residents and so may be more vulnerable to eviction. PCHA will collect monitoring information on the number of starter tenants evicted/extended/converted, action taken, appeals, and the number of households accessing support services; this will be analysed by diversity. This monitoring should enable any potential discriminatory action to be picked up during the pilot. Starter tenants will also have the right to appeal against eviction/extension to a panel of senior managers.</p> <p>PCHA will provide all starter tenants with information about their new tenancy, and will carry out regular visits to support people to sustain their tenancies.</p>			
<p><b>3.1.5 Sexual orientation</b></p>	<p><b>Yes</b></p>	<p><b>No</b></p>	<p><b>No</b></p>

<p>List the evidence: As this is a new procedure, PCHA does not have any evidence of the impact of operating the starter tenancies procedure. Starter tenants have a less security of tenure than other residents and so may be more vulnerable to eviction. PCHA will collect monitoring information on the number of starter tenants evicted/extended/converted, action taken, appeals, and the number of households accessing support services; this will be analysed by diversity. This monitoring should enable any potential discriminatory action to be picked up during the pilot. Starter tenants will also have the right to appeal against eviction/extension to a panel of senior managers.</p> <p>PCHA will provide all starter tenants with information about their new tenancy, and will carry out regular visits to support people to sustain their tenancies.</p>			
3.1.6 Religion or belief	<b>Yes</b>	<b>No</b>	<b>No</b>
<p>List the evidence: As this is a new procedure, PCHA does not have any evidence of the impact of operating the starter tenancies procedure. Starter tenants have a less security of tenure than other residents and so may be more vulnerable to eviction. PCHA will collect monitoring information on the number of starter tenants evicted/extended/converted, action taken, appeals, and the number of households accessing support services; this will be analysed by diversity. This monitoring should enable any potential discriminatory action to be picked up during the pilot. Starter tenants will also have the right to appeal against eviction/extension to a panel of senior managers.</p> <p>PCHA will provide all starter tenants with information about their new tenancy, and will carry out regular visits to support people to sustain their tenancies. In line with the rest of its operations, the association has translation and interpreting services available for use with residents.</p>			
3.2 Is there any evidence to believe that some or all of the groups in 3.1.1 – 3.1.6 could be differently affected by the function/policy?			
	Yes/No	Not Sure	
		<b>X</b>	
Please specify: As this is a pilot procedure we cannot yet know whether any groups			

will be affected differently by the operation of the procedure. PCHA will collect comprehensive monitoring data throughout the operation of the pilot programme and compare this to “matched” schemes where starter tenancies are not in operation. This will provide comparative data against which to assess the impact of starter tenancies.

3.3 What are the risks and/or benefits to the Genesis Housing Group of the positive or adverse impacts identified above? Please specify.

Risks: We do not know how the operation of the starter tenancies procedure will affect different diversity groups, and we will not know this until the programme is underway.

Benefits: PCHA currently have a number of services available across all its operations to reduce the chance of discrimination, for example providing translation services or vulnerability assessments. This programme is also only a pilot and is designed to enable any adverse impact to be picked up, for example by collecting monitoring statistics on action taken against diversity group. We will also survey residents directly to find out their perception of the operation of the pilot and any experiences – positive and negative – that they have had as a result of having a starter tenancy. We will then be able to analyse these results and determine whether any modifications need to be made to improve the operation of the procedure.

**Section 4. Assessment of Equality Impact  
(refer to 5.4 in pages 15 - 16 in guidance notes)**

4.1 It is possible to determine the equality impact of the function/policy by answering the following questions:

	Yes	No
4.1.1 Is any of the adverse impacts identified in 3.1.1 – 3.1.6 justified?	N/A	N/A
4.1.2 Is the differential treatment identified in 3.2 significant and justifiable in the wider policy objectives?	N/A	N/A
4.1.3 Is the risk identified in 3.3 justified?		X

4.2 If any of the answers in 4.1.1 to 4.1.3 is ‘no’, is there a better opportunity to meet the General duty by amending the function/policy?

	Yes	No
	X	

4.3 This next stage of assessment for this function/policy is: (please choose either 4.3.1, 4.3.2 or 4.3.3)

- If any of the answers in 4.1.1 to 4.1.3 is ‘no’, then a partial assessment should be undertaken.
- If additional evidence will be needed in order to support the amendments in Section 5, and an action plan is also needed in order to implement the amendments, then proceed to a full assessment

	Yes	No
4.3.1 It will not be assessed further but will continue to be monitored		X
4.3.2 It will proceed to a partial assessment (Section 5)		X
4.3.3 It will proceed to a full assessment (Sections 5 to 8)	X	

<b>Partial Impact Assessment</b>		
<b>Section 5. Consideration of Alternatives</b> (refer to 5.5 in page 16 in guidance notes)		
5.1 What amendments are proposed for this function/policy in order to mitigate the adverse impacts or for positive impacts?		
Amendments	Who By	When by
<b>See Section 6</b>		
5.2 Will more evidence be needed for supporting the amendments?		
	Yes	No
		X
5.3 If 'yes', what the additional evidence will be? <i>e.g. Who has expert knowledge of the issues? Which groups have a direct interest?</i>		
5.4 How will the additional evidence be acquired? ( e.g. through consultation, commission new research etc) <b>See Section 6</b>		
5.5 Will experts or partners be involved in the assessment at this stage?		
	Yes	No
		X
5.6 If 'yes', who are they? What are their roles?		
5.7 The next stage is to decide whether a full assessment will be necessary. This decision can be based on the answers to the following questions:		
	Yes	No
5.7.1 Has significant adverse impact on some groups of people been identified in 3.1.1 – 3.1.6?		X
5.7.2 Will significant amendments ( <b>See Section 6 for details</b> ) be needed to mitigate the adverse impacts, without affecting the policy's overall aims?	X	
5.7.3 Could the adverse impact result in unlawful discrimination?		X
5.7.4 Could the adverse impact hinder equality of opportunity?	X	
5.7.5 Could the adverse impact lead to tension between different groups?	X	
5.8 Based on the evidence gathered in 5.71 to 5.75, will this function/policy be subject to a full assessment?		
	Yes	No
	X	
5.8.1 Date by which the Full Impact Assessment will be completed: 09/10/08		
5.8.2 Officer responsible for carrying out the Full Impact Assessment: Jenny Preece, Policy Officer		

<b>Full Impact Assessment</b>						
<b>Section 6. Action Plan for Implementing Proposed Changes to the Function or Policy within the next 12 months (refer to 5.6 in page 16 in guidance notes)</b>						
Action	Target Group	Intended Outcome	Monitoring Arrangement	Responsible Officer	Completion Date	Action Completed Yes/No
<b>Issues to be considered:</b>						
Is the action relevant to the: - policy/ function - business objectives/ priorities	- Will the action have the same impact on all target groups - will another group be adversely affected?	- Is the intended outcome clear? - Will the intended outcome address all the concerns? - Any potential unintended impacts?	- Can the action be monitored within existing systems? - Are changes to existing monitoring systems required?	Who will be responsible for : - implementing action - monitoring action - overall policy development at senior management level?	When the action will be carried out & monitoring completed?	
Review procedure to ensure it emphasises supporting residents and tenancies.	All residents with starter tenancies.	To sustain tenancies and support residents.	No special monitoring required.	Policy Officer	End October 2008	Yes
Review procedure to ensure that it emphasises providing services to meet residents' needs.	All residents with starter tenancies.	To meet needs of residents, for example support needs or communication needs	No special monitoring required.	Policy Officer	End October 2008	Yes
Add in paragraph linking procedure with existing ASB procedure and policy; make clear that this procedure does not preclude separate action within another procedure.	Staff, e.g. Housing Services and Neighbourhood Liaison Team.	To ensure that staff understand the interaction and overlap between certain procedures, and how to use them together.	No special monitoring required. Staff will be trained on the new procedure.	Policy Officer	End October 2008	Yes
Review the diversity profile of those residents who are to be given starter tenancies during the pilot.	All residents with starter tenancies during the pilot.	To meet the needs of new residents and to tailor PCHA's services to meet these needs as far as	No special monitoring required.	Policy Officer	Before signing-up of new	

		possible.			residents	
Provide new residents with an information sheet about starter tenancies and their responsibilities, e.g. what type of behaviour is unacceptable.	All residents with starter tenancies.	To ensure that information is provided in an accessible manner and that residents can easily understand their tenancy responsibilities under the starter tenancies pilot.	No special monitoring required.	Policy Officer	End October 2008	Yes
For the pilot to be of real use, we need more than 8 residents to monitor. We need to look for more schemes that are coming over where starter tenancies may be used.	Potential residents who are new to social housing and may be eligible for a starter tenancy	To expand the pilot in order to be able to draw conclusions from the monitoring data. 8 residents will be too small a sample from which to infer results, as the impact of one resident will be very high and skew the results.	No special monitoring required; to be followed up with the Senior Management Team.	Head of Supported Housing; Operational Manager	To take to SMT at the next available date	
For the pilot to be of real use, we need something with which to compare the data collected from the starter tenants, i.e. comparable "matched" schemes where new residents are being given assured tenancies, rather than starter tenancies.	Potential residents who are nominated to a scheme where starter tenancies are not in operation.	To use this group as a comparator when analysing monitoring data collected from new starter tenants. This should enable us to draw conclusions about the effectiveness of using starter tenancies and the implications of rolling them out across PCHA's stock.	Housing Services Manager to identify schemes which may be matched. Monitoring arrangements for collection of diversity information to follow action on diversity monitoring, below.	Housing Services Manager	Ongoing as new schemes come up. Initial match for Larden Road required by end October/ start November	
To monitor the impact of starter tenancies, we need to collect information on: - level of ASB measured against comparable scheme - number of starter tenancies	All residents on starter tenancies.	By collecting this monitoring data we aim to produce a useful report that will highlight any adverse impact that the operation of the starter	Special monitoring arrangements are required to gather this information. The Housing Services Officer responsible for	Housing Services Officer; Housing Services Manager;	Ongoing; monthly reports to the Housing Services	

<p>granted</p> <ul style="list-style-type: none"> <li>- number of starter tenancies terminated and reasons</li> <li>- number of starter tenancy conversions</li> <li>- number of starter tenancy extensions and reasons</li> <li>- number of appeals against extension or eviction</li> <li>- number of households accessing support services</li> </ul> <p>These should be analysed against the different diversity strands in order to assess any adverse impact. Diversity for household members should also be captured.</p>		<p>tenancies procedure may have on a particular group. We will also collect comparative information from “matched” schemes where new residents have been given assured tenancies. This enables us to isolate the impact of the starter tenancy and address any adverse impact.</p>	<p>the scheme where starter tenancies are in operation (or the “matched” scheme) will produce monthly reports on each resident. These reports should be sent to the Housing Services Manager, who will arrange for the data to be loaded onto a central spreadsheet. This will enable us to produce reports to allow comparison against “matched” schemes. The reports should also be copied to the Tenant Support Team Manager.</p>	<p>Tenant Support Team Manager</p>	<p>Manager and Tenant Support Team Manager. Report to be produced at the end of the starter period to determine impact of starter tenancies pilot.</p>	
<p>Develop a survey to be used to determine starter tenants’ satisfaction with their tenancy and PCHA’s handling of their tenancy, and their understanding of its conditions.</p>	<p>All residents with starter tenancies</p>	<p>To highlight any gaps in PCHA’s services, for example inadequate explanation of the starter tenancy conditions. This will enable us to pick up on any areas of improvement and any areas in which residents feel dissatisfied with the starter tenancy programme.</p>	<p>Special monitoring requirements are needed. Policy Officer to receive survey responses from Housing Services Officer.</p>	<p>Housing Services Officer; Policy Officer</p>	<p>Survey to be completed by end December 2008.</p> <p>Responses to be gathered in line with consultation section, below.</p>	
<p>Develop a survey to be used estate wide to gather information from all</p>	<p>All residents on schemes where</p>	<p>To understand any wider impact the starter</p>	<p>Special monitoring requirements are</p>	<p>Policy Officer</p>	<p>Survey to be</p>	

<p>residents on their general satisfaction levels and awareness of starter tenancies.</p>	<p>starter tenancies are in use</p>	<p>tenancies pilot may have, for example increased resident satisfaction or lower perception of crime. Survey needs to be repeated on "matched" schemes where starter tenancies were not in use.</p>	<p>needed. Policy Officer to receive send out survey and collate responses.</p>		<p>completed at the end of the starter period.</p>	
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**Section 7. Consultation on Action Plan  
(refer to 5.7 in page 16 in guidance notes)**

**7.1 Groups that have been consulted:**

<u>Groups Consultation</u>	Ethnicity	Gender	Disability	Age	Sexual Orientation	Religion/ Belief
How consultation is carried out?	<p>During 6 month review visit a survey will be given to residents on starter tenancies. This will cover issues such as whether the details of the starter tenancy was explained well, whether the resident is satisfied with the type of tenancy they have, and whether they have had any negative experiences as a result of their tenure type.</p> <p>After one year a survey will be conducted on the whole estate to find out levels of satisfaction with the starter tenancies across the estate, for example whether residents without starter tenancies felt there was an impact across the estate.</p> <p>There will also be a survey conducted amongst former starter tenants within one year of the starter period coming to an end. This is to find out their impressions of starter tenancies now that they are an assured tenant, i.e. now that they have had experience of a different tenure type with which to compare the starter period.</p> <p>Officers will already have collected diversity information from these residents, which can be used to analyse the opinions/experiences of respondents.</p>					
When consultation is done?	<p>Consultation will be carried out at the 6 month review period with the starter tenant, and again within one year of the end of the starter period.</p> <p>At the end of the starter period a survey will also be carried out across the whole estate to find out about peoples' experiences and the impact of starter tenancies.</p>					
How many people are consulted?						
Which organisations are consulted?						
Consultation findings						

**7.2 Amendments or changes, if any, proposed as a result of consultation.**

**7.3 When the amendments will be carried out? By who?**

**Section 8. Publication of Results of Assessment, Consultation and Monitoring  
(refer to 5.8 in page 17 in guidance notes)**

**8.1 How the results will be published?**

Method (e.g. Genie, customer newsletters)	Date
Genie on Equality Impact Assessment page	

**8.2 Will access and language issues be considered? If yes, how?**

Translations of documents are available on request, as well as large print, Braille and audio versions.

Name of officer completed this assessment: Jenny Preece

Signature:

Date: 09/10/08

(Instruction : On completion of this assessment, please attach it to the function/policy and submit to the Senior Manager for approval).